

Table 5. Comments and Recommendations to Non-Project Items to be Used to Describe and Model the Affected Environment and No Action Alternative.

- SWP and CVP Delta Export Demands for No Action Alternative - The proposal for the No Action alternative is to identify these as fixed demands 4.1 million acre feet (maf) and 3.5 maf, respectively. The Program is developing a SWP variable level of demand (depending on water year type) which could replace the fixed level described for the No Action Alternative. The upper limit of this variable demand would not exceed 4.1 maf. The water demand for CVP Delta Export Demands includes reductions in the San Joaquin River Basin in certain wet years.
Recommendation: Describe SWP as a variable level of demand rather than the fixed level of demand and indicate CVP demand varies in certain wet years.
- Refuge Demands - The proposal for Level IV in the No Action Alternative is described as meeting CVPIA's Level IV amount. The US Bureau of Reclamation (USBR) is concerned with how the Level IV demand is proposed to be modeled but are okay with using Level IV as the future demand. The U.S. Environmental Protection Agency (USEPA), California Department of Fish and Game (DFG) and the U.S. Fish and Wildlife Service (USFWS) were in agreement with using Level IV as the future demand. Recommendation: Do not change current proposal and work with the agencies to develop appropriate modeling assumptions.
- Delta Standards - The USFWS requested that this assumption specifically mention that it include the Delta smelt and winter-run Biological Opinions. They also wanted the DWRSIM model updated so that it includes all the criteria within the Biological Opinions which can be modeled. Recommendation: Clarify assumption for both Affected Environment and No Action Alternative so that it is clear that they include the Delta smelt and winter-run Biological Opinions and work with the agencies to develop appropriate modeling assumptions.
- Vernalis Standard - The proposal for the No Action Alternative indicates that the standard will be met, but it does not indicate who will meet the standard. The USBR is concerned about how this assumption might be modeled but agreed, along with the USEPA and the USFWS, that the standard should be met for the No Action Alternative. The DFG concurred but is concerned about doing so without identifying the actions which will be taken to meet the standards.
Recommendation: Continue with assumption that standards will be met and work with the agencies to develop appropriate modeling assumptions.
- Instream flow requirements - The USFWS requested that the item specifically mention the winter-run Biological Opinion. Recommendation: Clarify description for both Affected Environment and No Action Alternative so that it is clear they include the winter-run salmon Biological Opinion.
- Water Conservation - The current proposal is to assume system-wide conservation levels outlined in DWR's Bulletin 160-93 for both the Affected Environment and No Action Alternative. The Program is proposing that the system-wide conservation levels for agricultural and urban water conservation and recycling be

increased over those outlined in Bulletin 160-93. The assumptions to substantiate this proposal are based on data contained in several sources and professional interpretation of that data. The sources include: DWR Bulletin 160-93; internal DWR staff work developed as background and draft input for Bulletin 160-98; USBR's "Demand Management - Technical Appendix #3 to the Least-Cost CVP Yield Increase Plan"; and Pacific Institute's "California Water 2020-A Sustainable Vision." The DWR indicated that the higher water conservation levels may prove difficult to model because they are not included in current models. The USBR, USEPA, DFG and USFWS were in agreement with using increased levels of conservation for the No Action Alternative. However, more information was sought on the proposal by all. Recommendation: Use the new proposal for the No Action Alternative and set up a meeting with the agencies to discuss the proposal and develop appropriate modeling assumptions.

- CVPIA's B(-2) water - Current proposal is to assume B-2 is in both Affected Environment and No Action Alternative. The USEPA, USFWS, DFG and USBR agree but there is a good deal of concern about how this item should be implemented and modeled among all parties. Recommendation: Continue with the current proposal and work with the agencies to develop an approach for implementation and modeling.